

OCT 16 1984

PJD, Inc.

(formerly Howe Richardson Company)

**10300 North Torrey Pines Road
La Jolla, California 92037**



SEMS DocID

623558

(619) 455-8538

October 12, 1984

Ms. Mary Jane O'Donnell
Environmental Engineer
NH/MA/VT Waste Programs Section
U. S. Environmental Protection Agency, Region I
J. F. Kennedy Federal Building
Boston, MA 02203

Dear Ms. O'Donnell:

Please refer to my letter to you dated June 13, 1983, on behalf of Howe Richardson Scale Company (now known as PJD, Inc.) and your letter dated May 17, 1983, regarding the scope of the on-site groundwater monitoring program at the closed Howe Richardson Scale Company facility on Strongs Avenue in Rutland, Vermont. Routine sampling carried out in 1980 and 1981 on that property revealed the presence of low concentrations of several volatile organic contaminants in water very near the ground surface. The consultant firm who carried out that program concluded, in 1981, that "groundwater quality within the confines of the Howe Richardson property is not being adversely affected by plant operations nor is the water quality of Moon Brook adversely affected." This letter is an update of the status of that subsurface water monitoring program.

Recent samples taken in 1983 and 1984 have shown elevated concentrations of two materials; 1,1 Dichloroethylene (1,1 DCE) and 1,1 Dichloroethane (1,1 DCA) in one of the eight available test wells; while the concentrations of all other detected contaminants in this well and all contamination in all of the other seven wells appear to be holding steady or slightly decreasing. Most of the wells show no VOC contamination, and water samples from Moon Brook, downstream of the property, also continue to show no contamination. Because of inconsistencies in the data from one group of well water samples to another, there is at this time some uncertainty as to its meaning. It is clear, however, that the contaminated subsurface water is quite localized, that none of it has left the property and that no sources of drinking water are threatened.


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The Howe Richardson Company was owned by a subsidiary of Aerojet General for about ten years from 1973 to 1983. The Rutland plant was operated by Howe Richardson and its predecessors for over 100 years from 1873 until it was shut down and vacated in 1982. The Strongs Avenue property is leased and is currently under the management of PJD, Inc. (formerly Howe Richardson Company).

We have no knowledge of the use of 1,1 DCE or 1,1 DCA on this property during its long history, and it is possible that the source is on adjacent property. We intend to carry out a more extensive investigation to define the extent of the contamination and to evaluate what other action may be appropriate.

We will be happy to discuss this situation with you or other representatives of your Agency, and will keep you fully informed of our ongoing efforts. I am transmitting a copy of this letter to the State of Vermont, Agency of Environmental Conservation, for their information.

Sincerely,



R. B. O'Brien
Director of Environmental
Affairs and Safety

RBO:ch.6